

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO  
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**STIPULATED MOTION TO EXTEND THE PAGE LIMITS  
FOR MEMORANDA RELATED TO MOTIONS *IN LIMINE***

Pursuant to Local Rule 7.1(f), Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc., and Plaintiff James Hayden, by and through their counsel, respectfully request permission to file oppositions to omnibus motions *in limine* that exceed the 15-page limit established for all memoranda related to non-dispositive motions by 5 pages, for a total of 20 pages. Each party filed opening omnibus motions *in limine* on August 1, 2022. *See* Dkt. Nos. 169, 171. Prior to filing those motions, the parties jointly requested permission to exceed the 15-page limit for all memoranda related to their motions, Dkt No. 164, which this Court granted on July 29, 2022.

Pursuant to the Court's scheduling order, *see* Dkt. 148, each party will be submitting opposition briefs on August 29, 2022. As the parties' prior motion to exceed the page limit may have been ambiguous as to whether they sought to extend the page limit for their opposition briefs, the parties are submitting this motion. There is good cause to extend the page limits for opposition briefs to 20 pages because it will allow the parties equal pages for both opening and opposition briefs. It will also allow the Court to be more fully informed before trial about

evidentiary disputes and the applicable law, thus minimizing issues during trial and leading to a more efficient and smooth process.

Dated: August 25, 2022

*/s/ Andrew Alexander*

---

John S. Cipolla (Ohio Bar No. 0043614)  
Daniel McMullen (Ohio Bar No. 0034380)  
Andrew Alexander (Ohio Bar No. 0091167)  
Dustin Likens (Ohio Bar No. 0097891)  
CALFEE, HALTER & GRISWOLD LLP  
The Calfee Building  
1405 East Sixth Street  
Cleveland, Ohio 44114-1607  
Telephone: (216) 622-8200  
Facsimile: (216) 241-0816  
jcipolla@calfee.com  
dmcmullen@calfee.com  
aalexander@calfee.com  
dlikens@calfee.com

*Of Counsel*

Kimberly A. Pinter (Ohio Bar No. 0084277)  
CALFEE, HALTER & GRISWOLD LLP  
The Calfee Building  
1405 East Sixth Street  
Cleveland, Ohio 44114-1607  
Telephone: (216) 622-8200  
Facsimile: (216) 241-0816

*Attorneys for Plaintiff James Hayden*

*/s/ Joshua L. Simmons*

---

Dale M. Cendali (*pro hac vice*)  
Joshua L. Simmons (*pro hac vice*)  
Chris Ilardi (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
dale.cendali@kirkland.com  
joshua.simmons@kirkland.com  
chris.ilardi@kirkland.com

Miranda D. Means (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
200 Clarendon Street  
Boston, Massachusetts 02116  
Telephone: (617) 385-7500  
miranda.means@kirkland.com

Matthew J. Cavanagh (0079522)  
MCDONALD HOPKINS LLC  
600 Superior Avenue, East, Ste. 2100  
Cleveland, Ohio 44114  
Telephone: 216.348.5400  
Fax: 216.348.5474  
mcavanagh@mcdonaldhopkins.com

*Attorneys for Take-Two 2K Games, Inc. and  
Take-Two Interactive Software, Inc.*